

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

VICKY RODRÍGUEZ TORRES, et al.

Plaintiffs

v.

Government Development Bank P.R., et al.

Defendants

**CIVIL No. 09-01151-JP**

TITLE VII AGE & GENDER DISCRIMINATION,  
TORTS

TRIAL BY JURY

**MOTION IN REQUEST FOR ORDER OF PRESERVATION AND LITIGATION HOLD  
CERTIFICATION**

Pursuant to **L.R.Civ.P. 26(b)**, plaintiffs certify that they made a reasonable and good-faith effort to reach an agreement with opposing counsel on the matters set forth in the present motion in the following instances:

September 2<sup>nd</sup> 2009: at 7:02 A.M.; 12:13 P.M.; 2:45 P.M., and

September 3<sup>rd</sup> 2009: at 4:38 A.M and 2:00 P.M.

Plaintiffs' last attempt to reach opposing counsel was by hand delivery and regular mail. **Exhibit 1** contains the letter in compliance with plaintiffs duty to confer, and corresponding USPS Form 3817, certificate of mailing. Opposing counsel did not respond to plaintiffs' invitation to submit a reaction, stance or contribution to their proposed motion.

Respectfully submitted in San Juan, Puerto Rico, this 3<sup>rd</sup> day of September, 2009

S/William Meléndez Menéndez

William Meléndez Menéndez

USDC-PR No. 226902

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LAW OFFICES OF  
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AND  
ASSOCIATED CONSULTANTS

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Miguel A. Cuadros Gómez (1914-1987)

September 3, 2009

**BY HAND & REGULAR MAIL**

Mariela Rexach-Rexach, Esq.  
Schuster & Aguiló, LLP  
P.O. Box 363128  
San Juan, Puerto Rico 00936-3128

Re: Vicky Rodríguez Torres v. Government Development Bank for Puerto Rico, et als.  
Case Number: 09-CV-01151 (JP)

Dear Ms. Rexach:

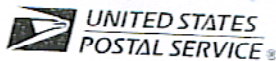
As indicated by our of counsel William Melendez in letter dated September 2, 2009, Plaintiffs have the intention of requesting from the Court a finding of spoliation, as well as orders for preservation, and litigation holds against GDB. We would prefer that this be a joint-effort. Consequently, we are providing you with a copy of the previously indicated motion for litigation hold. If there is any reaction, stance or contribution you would like for us to include in the above filing, please submit it to our attention via e-mail this afternoon, by 5:00 p.m.

Additionally, we have not received confirmation for the taking of Dr. Franceschini's deposition, tomorrow, September 4, 2009. We are providing you with an additional copy of our communication dated August 27, 2009 which relates Dr. Franceschini's deposition costs, as well as additional copies of his CV and list of cases.

Cordially,

**Cuadros & Cuadros and Associated Consultants**

Olga M. Benítez Quiñones



**Certificate Of Mailing**

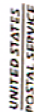
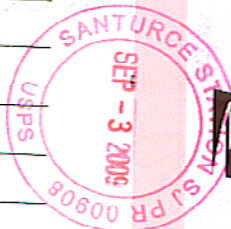
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From: CONSULTORES JURIDICOS ASOCIADOS  
701 Ponce de León Ave., Suite 215  
San Juan, Puerto Rico 00907

To: Mariela Bexach, Esq.  
Shuster & Aguiló, LLP  
P.O. Box 363128  
San Juan, PR 00936-3128

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